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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ZAINA DOUMAT, individually,
Plaintiff,

vs.

TARGET CORPORATION; DOES 1-X, and
ROE CORPORATIONS I-X, inclusive,
Defendants.

CASE NO.: 2:23-cv-01231-APG-DJA

STIPULATION AND PROPOSED ORDER TO EXTEND DISCOVERY DEADLINES
(Fourth Request)

Pursuant to LR 6.1 and LR 26.4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case sixty (60) days as set forth below:

Discovery Completed:

1. All parties have made their initial and supplemental disclosures pursuant to FRCP 26.
2. Plaintiff served Defendant with Interrogatories, Request for Admissions, and Requests for Production of Documents.
3. Defendant served Plaintiff with Interrogatories, Request for Admissions, and

Request for Production of Documents.

4. Defendant responded to Plaintiff's written discovery.
5. Plaintiff responded to Defendant's written discovery.
6. Defendant has provided Supplements 1-6 to its Initial FRCP Disclosure.
7. Deposition of Plaintiff
8. Deposition of Plaintiff's husband, Samuel Shetayh
9. Deposition of Defendants Target's current employee Frankie Romano

Discovery that remains to be completed:

1. Deposition of the Rule 30(b)(6) witness on behalf of the Defendant.
2. Depositions of Defendants Target's current and former employees.
3. Defendant intends to conduct FRCP Medical Examination, prior to expert disclosures.
4. Deposition of Plaintiff's treating physicians.
5. Retention of experts.
6. Both parties need to depose the experts retained.
7. Gather recently disclosed medical provider records.
8. Complete Plaintiff's deposition

Reasons that Discovery has not yet been completed are:

The parties have been diligent in conducting discovery. Defendant served Plaintiff with written discovery on October 31, 2023. After receiving responses to written discovery, Plaintiff had designated various categories for an FRCP 30(b)(6) deposition. Unfortunately, the person who was anticipated to testify in that capacity, and who was prepared, developed complications with a medical condition that eliminated her from this role. Target has identified and is preparing an alternative witness, or witnesses, but, as this witness' deposition testimony will be required for preparation of Plaintiff's liability expert, an additional 60 days is being requested so that the depositions can be completed, and experts may be prepared and designated.

1 Additionally, during the deposition of Plaintiff on March 8, 2024, she testified that she had
 2 sought treatment for injuries that she claims is the result of the subject incident since the last date
 3 of records that had been previously provided, namely December of 2022. Plaintiff provided the
 4 identities of these providers and Defendant is gathering these records so that the Plaintiff's
 5 deposition can be concluded.

6 Therefore, the parties request an additional sixty (60) days to allow Plaintiff's to take
 7 depositions, allow Plaintiff's deposition to be concluded, and allow both parties to serve expert
 8 reports and conduct depositions. This request is not made in bad faith, with dilatory motive, or for
 9 any purposes of improper delay.

10 **Proposed schedule for completing discovery:**

11 Accordingly, the parties request the discovery deadlines be extended to allow ample time
 12 for the court to make its ruling and allow the parties to complete the remaining discovery.

13 The following is a list of discovery deadlines and the parties' proposed extended
 14 deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Amend Pleadings and Add Parties	January 31, 2024	Not Extended
Initial Disclosure of Experts	Tuesday, July 30, 2024	Friday, September 28, 2024
Disclosure of Rebuttal Experts	Monday, August 29, 2024	Monday, October 28, 2024
Discovery Cut-Off	Monday, September 30, 2024	Friday, November 29, 2024
Dispositive Motions	Tuesday, October 29, 2024	Friday, December 27, 2024
Joint Proposed Pre-trial Order	Friday, November 29, 2024	Tuesday, January 28, 2025

15 WHEREFORE, the parties respectfully request this honorable Court adopt the foregoing
 16 stipulation of the parties which will result in the new discovery deadlines.

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1 IT IS RESPECTFULLY SUBMITTED.

2 DATED this 20th day of May, 2024

DATED this 20th day of May, 2024

3 CLEAR COUNSEL LAW GROUP

PERRY & WESTBROOK

4 */s/ Scott Flinders*

/s/ Alan W. Westbrook

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11 **ORDER**

12 **IT IS SO ORDERED.**

13 DATED this 21st day of May 2024.

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DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

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20 Submitted by:
21 PERRY & WESTBROOK
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22
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